

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 22-258 SRN

UNITED STATES OF AMERICA,

**INFORMATION**

Plaintiff,

18 U.S.C. § 1347

v.

18 U.S.C. § 982(a)(7)

18 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

CHARLES HOWARD JORENBY,

Defendant.

THE UNITED STATES ATTORNEY CHARGES THAT:

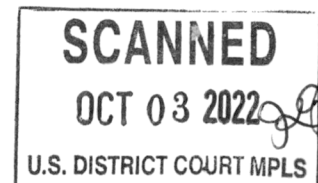
**INTRODUCTION**

At all times relevant to this Information:

1. Defendant CHARLES HOWARD JORENBY was a licensed psychologist residing and providing counseling services in the State and District of Minnesota.

2. Blue Cross Blue Shield of Minnesota (hereafter "BCBS") was a health insurance company and a "health care benefit program" as defined in Title 18, United States Code, Section 24(b) and referenced in Title 18, United States Code, Section 1347.

3. From approximately January 2013 and continuing through February 2020, the defendant, CHARLES HOWARD JORENBY, submitted false claims for payment under insurance policies managed by BCBS.



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4. On numerous occasions, defendant CHARLES HOWARD JORENBY submitted fraudulent bills to BCBS claiming he had provided counseling services to persons who later reported they had never been a patient of the defendant.

5. On other occasions, defendant CHARLES HOWARD JORENBY submitted fraudulent bills to BCBS claiming he had provided in-person counseling services to patients at his offices in Minnesota when it was physically impossible to have done so (namely, on dates and at times when the defendant was travelling out of state, or when the purported patient was receiving care at a different residential facility).

**COUNT 1**  
**(Health Care Fraud)**

6. The allegations contained in paragraphs 1 through 5 are realleged and incorporated as if fully set forth in this paragraph.

7. From on or around January 2013 and continuing through February 20, 2020, in the State and District of Minnesota, the defendant,

**CHARLES HOWARD JORENBY,**

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a health care benefit program, to wit: BCBS, and to obtain, by means of materially false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of

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BCBS, in connection with the delivery of and payment for health care benefits, items and services, all in violation of Title 18, United States Code, Section 1347.

**FORFEITURE ALLEGATIONS**

8. As a result of the offenses alleged in Count 1, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(7), any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to violations of Title 18, United States Code, Section 1347.

9. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Dated: October 3, 2022

ANDREW M. LUGER  
United States Attorney

s/Lindsey E. Middlecamp

BY: LINDSEY E. MIDDLECAMP  
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